

IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF PUERTO RICO

Affidavit in Support of Criminal Complaint

I, Michael R. Ramirez, a Special Agent with the Drug Enforcement Administration (DEA), being duly sworn, depose and state as follows:

1. I am a Special Agent (SA) of the DEA and as such, I am an investigative or law enforcement officer of the United States within the meaning of Title 18, United States Code, Section 2510 (7), that is, an officer of the United States who is empowered to conduct criminal investigations of, and to make arrests for, offenses enumerated in Title 18, United States Code, Section, 2516.
2. I have conducted and assisted in investigations into the unlawful possession, possession with the intent to distribute, distribution of controlled substances, importation of controlled substances, and the associated conspiracies in violation of Title 21, United States Code, Sections 841(a)(1), 843(b), 846, 952, and 963. I have received detailed instructions and participated in various investigations concerning the unlawful importation and distribution of controlled substances, the laundering and concealment of drug proceeds, the illegal use of communication facilities by drug traffickers in furtherance of their criminal activities and conspiracies to engage in these activities. I have experience and training in conducting surveillance operations, analyzing telephone records, interviewing witnesses, executing arrest warrants, participating in physical surveillance and other investigative techniques. The investigations in which I have participated have resulted in the arrest and prosecution of individuals who have smuggled, received and distributed controlled substances, including marijuana and cocaine as well as the seizure of those illegal drugs and proceeds of the sale of those illegal drugs.

3. Because of my personal participation in this investigation, and because of information provided to me by other agents and officers, and my personal observations, I am familiar with the facts and circumstances of this investigation. My experience in investigating drug offenders, my education, my conversations with senior drug agents and chemists, and my specialized training formed a basis of the opinions and conclusions set forth below which I drew from the facts set forth herein.
4. The information contained in this affidavit is based on my personal knowledge and observations during the course of this investigation; on information conveyed to me by other law enforcement officials; and on my review of records, documents, and other physical evidence obtained during this investigation. This affidavit is not intended to include every fact observed by me or known by the government.
5. Based on my training and experience, my knowledge of this case and my discussions with other law enforcement officers, I am familiar with narcotic traffickers' and money launderers' methods, schemes, and operations, and know:

Probable Cause

6. On February 25, 2025 at approximately 10 p.m., PRPB Agents arrived at the Enudio Negron PHP to begin surveillance. Under the illumination provided by the floodlights of Building 1, PRPB Agents observed Jeremy Jose MALDONADO-Rivera (hereinafter MALDONADO-Rivera) wearing a black jacket, blue jeans, and wearing a grey Supreme fanny pack over his chest area walking on the sidewalk towards Building 1. PRPB Agents observed MALDONADO-Rivera carrying a clear plastic gallon-sized bag containing a green leafy substance which, based on the Agents' experience, was marijuana. As PRPB Agents exited their vehicle, an unknown bystander shouted "Agua", causing MALDONADO-Rivera to turn

around and notice the Agents. PRPB Agents identified themselves as police and ordered MALDONADO-Rivera to stop, to which MALDONADO-Rivera fled on foot up the staircase of Building 1.

7. PRPB Agents pursued MALDONADO-Rivera up the staircase as MALDONADO-Rivera entered Apartment 21. MALDONADO-Rivera attempted to close the door to prevent Agents from pursuing him and as PRPB Agents were attempting to push the door open, they could hear MALDONADO-Rivera yelling in Spanish to someone inside the apartment to throw it away because the police were there.
8. When PRPB Agents were able to gain entry, they observed Roric Harvey NUNEZ-Garcia and Javier SANCHEZ-Perez (hereinafter NUNEZ-Garcia and SANCHEZ-Perez) sitting at a table at the entrance area of the apartment. Agents observed a mound of loose marijuana, multiple empty baggies of different colors, a scale, and various small black baggies that had already been packaged with marijuana at the table where NUNEZ-Garcia and SANCHEZ-Perez were sitting. Additionally, Agents observed four pistol magazines that were on the table.
9. At the time of arrest, PRPB Agent Gabriel Rodriguez-Rodriguez (#36701) observed an extended pistol magazine protruding from the fanny pack that was on MALDONADO-Rivera's chest and retrieved a beige color Glock 22 pistol bearing serial number BVVA900 loaded with an extended magazine. During the arrest and not in response to any questioning, NUNEZ-Garcia said that the beige color Glock 22 was his, and not MALDONADO-Rivera's. Further inspection of the beige Glock 22 revealed that the original backplate of the pistol had been replaced by a silver metal chip which, based on the Agents' experience, indicated that it had been modified for fully automatic fire capability. A further search of MALDONADO-Rivera's waistband revealed a second pistol, a Glock 23C bearing serial number CCPE152

(MALDONADO-Rivera has a firearm license to carry this firearm) loaded with an extended magazine and a magazine holster containing an additional extended magazine.

10. At the time of arrest, PRPB Agent Julio Quintana (#21206) found a black Glock 22 pistol bearing serial number DAV951 in the waistband of SANCHEZ-Perez which was loaded with an extended magazine. During the arrest, and not in response to any questioning, SANCHEZ-Perez stated that the black Glock 22 found on his person was his. Further inspection of the black Glock 22 revealed that the original backplate had been manipulated and shaved-down to make it capable of fully automatic fire.
11. After being transported to the Ponce Narcotics Unit for processing, PRPB Agents advised MALDONADO-Rivera of his Miranda Rights, to which he agreed to answer questions. MALDONADO-Rivera stated that he was the owner of the drug point in Enudio Negron PHP, and admitted ownership of the two pistols that were found on his person. Furthermore, MALDONADO-Rivera admitted that he had knowledge that the beige Glock 22 had been altered to be capable of fully automatic fire. While referring to the silver metal chip on the beige Glock 22, MALDONADO-Rivera told agents that it looked good and that nobody makes them like he does. MALDONADO-Rivera also stated that he did not have anything to do with the black Glock 22 found in SANCHEZ-Perez's waistband.
12. The next day on February 26, 2025, Federal Agents from the Ponce District Office also interviewed MALDONADO-Rivera after advising him of his Miranda Rights, to which he agreed to answer questions. MALDONADO-Rivera gave a different statement to federal agents, stating that he was sitting on the front stoop of Building 1 when he witnessed PRPB Agents get out of their vehicle and run past him up the staircase. MALDONADO-Rivera stated that he then heard someone shouting that he (MALDONADO-Rivera) had a gun, to which he

turned around and saw PRPB Agents coming down the staircase to arrest him. Additionally, MALDONADO-Rivera claimed to only be in possession of one pistol (the one for which he has a license) and two 15-round capacity magazines at the time of his arrest. MALDONADO-Rivera blamed the PRPB for always intervening with him, claiming that he quit his involvement with the illegal drug business in 2022 after his previous drug charges were dismissed. MALDONADO-Rivera stated that he currently works as a tow truck driver.

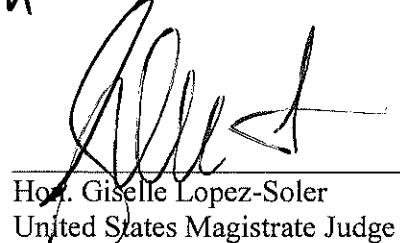
MICHAEL
RAMIREZ

Digitally signed by MICHAEL
RAMIREZ
Date: 2025.02.27 11:07:57 -04'00'

Michael Ramirez
Special Agent
Drug Enforcement Administration

Sworn and subscribed by phone pursuant to Rule 4.1 this 27th day of February 2025, in San Juan, Puerto Rico

at 11:32 AM


Hon. Giselle Lopez-Soler
United States Magistrate Judge
District of Puerto Rico